

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**ROBERT A. RICHMOND, SR**

**Plaintiff,**

**V.**

**Civil Action No. 99-192E**

**JAMES S. PRICE, et al.,**

**Defendant.**

## **DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS**

Defendants hereby propose that the following voir dire questions be used as a supplement to the standard questions set forth in Local Rule 47.1:

Juror's Name: \_\_\_\_\_ Juror's Number: \_\_\_\_\_

For purposes of the following questions, the term “immediate family” includes spouses, children, parents, brothers, sisters and persons sharing your residence.

1. What level of education have you attained? (circle one)
- (a) less than high school                      (b) high school
- (c) some college courses                      (d) college
- (e) some graduate courses                      (f) graduate school

2. Are you acquainted with any party referred to below who may testify as a witness during the trial of this case? If yes, circle the individual(s).

- (a) Gregory Wilkes                      (b) Randy McElravy                      (c) James Bedilion  
(d) Robert Richmond

3. Have you, or has any member of your immediate family, ever been the victim of a crime?

Yes \_\_\_\_\_ No \_\_\_\_\_

4. If your answer to question No. 3 is "Yes," would that fact affect your ability to render a fair and impartial verdict based on the evidence presented in court and the judge's instructions on the law?

Yes \_\_\_\_\_ No \_\_\_\_\_

5. Have you, or any member of your immediate family, ever been employed in law enforcement, either by a state or local police department, government agency, investigative agency, private detective or security guard agency or prosecuting attorney's office?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Have you, or has any member of your immediate family, ever been employed by or in any way connected with the Commonwealth of Pennsylvania?

Yes \_\_\_\_\_ No \_\_\_\_\_

7. Have you, or any member of your immediate family, ever been employed by, or in any way connected with, the Pennsylvania Department of Corrections?

Yes \_\_\_\_\_ No \_\_\_\_\_

8. Have you, or has any member of your immediate family, ever been employed in a jail or prison, or as a parole or probation officer?

Yes \_\_\_\_\_ No \_\_\_\_\_

9. Would you tend to believe the testimony of a corrections official, simply because he or she is a corrections official, more than the testimony of a citizen of this state?

Yes \_\_\_\_\_ No \_\_\_\_\_

10. Would you tend to disbelieve the testimony of a corrections official, simply because he or she is a corrections official, more than the testimony of a citizen of the state?

Yes \_\_\_\_\_ No \_\_\_\_\_

11. Have you, or has any member of your immediate family, ever been incarcerated in a local, state, or federal prison for conviction of a criminal offense?

Yes \_\_\_\_\_ No \_\_\_\_\_

12. Do you have any feeling, opinion or belief concerning the nature or quality of prisons generally or the actions of employees at SCI-Greene specifically, that would affect your ability to serve as a fair and impartial juror and render a fair and impartial verdict based on the evidence presented in court and the court's instructions on the law in a case in which the plaintiff is a citizen of this state and the defendants are corrections officers?

Yes \_\_\_\_\_ No \_\_\_\_\_

13. Have you, or has any member of your immediate family, been associated with a prisoners' rights organization?

Yes \_\_\_\_\_ No \_\_\_\_\_

14. Have any of you heard or read things in the media which relate to prison conditions? [If the answer is yes, follow-up questions should be done at side bar so as not to taint the rest of the jury pool].

Yes \_\_\_\_\_ No \_\_\_\_\_

15. Would your personal religious beliefs or convictions affect your ability to serve as a fair and impartial juror and render a fair and impartial verdict based on the evidence presented in court and the court's instructions on the law concerning a prisoner?

Yes \_\_\_\_\_ No \_\_\_\_\_

Respectfully submitted,

**Thomas W. Corbett, Jr.**  
Attorney General

BY: /s/ Craig E. Maravich  
CRAIG E. MARAVICH  
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Date: January 23, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2006, I electronically filed the foregoing *Defendant's Proposed Voir Dire* with the Clerk of Court using the CM/ECF system.

And I hereby certify that I have mailed the foregoing document by United States Postal Service to the following non CM/ECF participants:

**ROBERT A. RICHMOND**

DB-7852

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By: /s/ Craig E. Maravich  
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